

458-12423

RAV/lak

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

ARJUN GROVER,)	
)	
Plaintiff,)	
)	
vs.)	No.:
)	
AL RAYYAN TOURISM INVESTMENT,)	
COMPANY and RADISSON CHICAGO MP)	
MANAGEMENT, LLC, d/b/a RADISSON)	
BLU AQUA HOTEL,)	
)	
Defendants.)	

NOTICE OF REMOVAL

NOW COMES the Defendant, RADISSON CHICAGO MP MANAGEMENT, LLC, hereinafter referred to as “RADISSON CHICAGO”, by and through its attorneys, STONE & JOHNSON, CHARTERED, and hereby files this Notice of Removal based on the following:

1. On or about March 14, 2016, the Plaintiff, ARJUN GROVER, filed a summons and Complaint in the Circuit Court of Cook County, Illinois under case number 2016 L 002677 against the Defendant, RADISSON CHICAGO and AL RAYYAN TOURISM INVESTMENT COMPANY, as a result of an incident which allegedly took place at the Filini Restaurant located 221 North Columbus Drive in Chicago, Cook County, Illinois on May 20, 2015. A copy of Plaintiff’s Summons and Complaint is attached hereto as Exhibit “A”.

2. On or about March 15, 2016, a copy of the Plaintiff’s Complaint was served on RADISSON CHICAGO. A copy of the Notice of Service of Process is attached hereto as Exhibit “B”.

3. According to Plaintiff's Complaint, the Defendant, AL RAYYAN TOURISM INVESTMENT COMPANY, is a wholly owned subsidiary of AL FAISAL HOLDING COMPANY which is based in Qatar. The Defendant, AL RAYYAN TOURISM INVESTMENT COMPANY, has not yet been served in this matter or filed any responsive pleadings.

4. According to Plaintiff's Complaint, the Defendant, RADISSON CHICAGO, allegedly owned, operated, managed, maintained, and controlled the Filini Restaurant involved in this incident, and allegedly improperly maintained its chairs at the restaurant causing Plaintiff to sustain various injuries when a chair collapsed while he was sitting on it on May 20, 2015.

5. According to Plaintiff's Complaint, the Plaintiff resides in Indiana, and upon information and belief has been a resident of Indiana at all relevant times including at the time of filing this Complaint.

6. The Defendant, RADISSON CHICAGO, is a Delaware limited liability company. The sole member of RADISSON CHICAGO is Carlson Hotels Management Corporation which is a New Jersey Corporation with its principal place of business and headquarters in the state of Minnesota.

7. According to Plaintiff's Complaint, the Defendant, AL RAYYAN TOURISM INVESTMENT COMPANY, is a wholly owned subsidiary of AL FAISAL HOLDING COMPANY based in Qatar.

8. Pursuant to the provisions of 28 USC Section 1446, a defendant desiring to move a case to Federal Court must comply with three elements in order to effectively remove a case, (1) complete diversity among the parties, (2) unanimous consent amongst the served defendants, and (3) the Notice of Removal must be filed within thirty (30) days of service on the first served defendant.

9. All served defendants in this case consent to the removal to Federal Court, there is complete diversity among the parties, and the Notice of Removal has been filed within thirty (30) days of service on the first served defendant.

10. According to the Complaint, the Plaintiff, ARJUN GROVER, allegedly sustained during the subject incident personal injuries resulting in significant injuries and resulting damages.

11. According to the medical records obtained before suit was filed, the Plaintiff allegedly aggravated a pre-existing low back, neck, and hip condition during the subject incident, and has been receiving physical therapy, chiropractic treatment, and pain shots for these conditions.

12. According to the medical records obtained before suit was filed, the Plaintiff was diagnosed with a torn tendon in his shoulder following the subject incident which was confirmed on an MRI taken on July 9, 2015.

13. The Plaintiff has sought damages in an amount exceeding \$50,000 in the prayer for relief in his Complaint filed in the Circuit Court of Cook County Illinois under case number 2016 L 002677. Therefore, the amount in controversy in this case exceeds \$75,000 exclusive of interest and costs.

14. Under the provisions set forth in 28 USC Section 1332, this court has jurisdiction when complete diversity of citizenship exists between the plaintiff and all defendants, and the matter in controversy exceeds the sum of \$75,000, exclusive of interest and costs.

15. A Notice of Filing of Removal has been timely filed with the Circuit Court of Cook County, Illinois. A copy of the Notice of Filing of Removal is attached hereto as Exhibit "C".

WHEREFORE, the Defendant, RADISSON CHICAGO MP MANAGEMENT, LLC, removes this action to the United States District Court for the Northern District of Illinois.

Respectfully submitted,

STONE & JOHNSON, CHARTERED



By: _____
One of the Attorneys for Defendant,
RADISSON CHICAGO MP MANAGEMENT,
LLC

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ATTORNEY'S RULE 11 CERTIFICATION

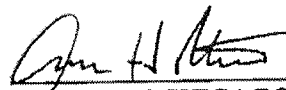
The Undersigned attorney certifies that he has read the foregoing Notice of Removal, that to the best of his knowledge, information and belief, formed after reasonable inquiry it is well grounded in fact the same is warranted by existing law or a good faith argument for the extension, modification, or reversal of existing law, and that it is not interposed for any improper purpose, such as to harass or to cause unnecessary delay or needless increase in the cost of litigation.



Richard A. Valek, Attorney for Defendant,
RADISSON CHICAGO MP MANAGEMENT,
LLC

DEFENDANT'S RULE 11 CERTIFICATION

The undersigned Defendant, certifies, subject to the penalties provided by law, that he/she has read the foregoing Notice of Removal and that to the best of his/her knowledge, information, and belief, the matters stated therein, as they pertain to the Defendant, are true in substance and fact except those matters which are alleged on information and belief, which he/she believes are true.

 3/21/16

RADISSON CHICAGO MP MANAGEMENT, LLC